


URS

Washington Division

July 31, 2008

Nuclear Materials Licensing Section
DMS/NMSB-B
U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Attention: Jackie Cook

Subject: AMMENDMENT FOR NRC MATERIAL LICENSE NO. 03-27724-01
NRC Docket No. 030-35960
DA Contract DAAA09-97-C-0098

Dear Ms. Cook:

Washington Demilitarization Company is submitting the enclosed Amendment for Material License 03-27724-01 (Docket No. 030-35960). Enclosed are copies of affected pages from the Pine Bluff Chemical Disposal Facility (PBCDF) radiation program and prospective review. Change being made will be to suspend required use of personal radiation dosimetry based on the data presented in this letter.

Should you have any questions please contact me at 870-540-2183.

Sincerely,



Michell Coats, MS, CIH, CSP, CHMM
Safety Supervisor
Radiation Safety Officer

MC/mc
Enclosures

cc: PMCSO – Mark Greer
PMCSO – Clara Moraga
PBA RSO – Rick Sabin
WDC VP Project General Manager – Mr. David Reber
WDC Plant Manager – Mr. Guy Campbell
WDC Contracts – Mr. Greg Hayley
WDC Safety – Mr. Marty Buell

Amendment for NRC License No. 03-27724-01

PROSPECTIVE REVIEW TO SUPPORT AMMENDMENT

In accordance with the site Radiation Safety Program, monitoring of personal exposure has been accomplished from the time the fixed gauges were installed at PBCDF in April of 2003 through January of 2006. Sufficient documentation has been acquired to demonstrate personal exposure monitoring (i.e. dosimetry) is no longer required.

Landauer Luxel Badge Results

Monitoring Period	High TEDE Reported (in REM)	Avg. TEDE Reported (in REM)
04/15/03 - 01/14/04	0.007	0.003
01/15/04 - 01/14/05	0.009	0.003
01/15/05 - 01/14/06	0.001	0.00025 *

* Facility became operational during 2005, thus less frequent access to the gauges and lower personal exposure was experienced. Six of the eight users were ND.

Conclusion:

Based on the data reported above the highest TEDE (whole body) reported was 0.009 rem per year, therefore, personal exposures are expected to be significantly less than 10% of the threshold established in 10 CFR 20.1201 of 5 rem per year for TEDE whole body (i.e. 500 mrem/year).

PB-IH-010

Radiation Safety Program

REV 4 19 Nov 07
CHG 1 23 Jan 08

- 6.3.4 All applicable safety and maintenance procedures including (but not limited to) PB-IH-016, DFS Jam Sensor Lockout/Tagout Leak Test and Shutter Check, will be followed when working with the gauges.
- 6.3.5 No restricted areas (radiation areas) are anticipated because of the nature of the equipment and installation; however, the RSO or Alternate shall determine, during gauge surveys, if restricted areas are present. If restricted areas are found during the survey, the proper signage shall be posted. Personnel working in the identified radiation areas shall receive training equivalent to that listed in step 6.2.1.2.
- 6.4 INSPECTIONS, SURVEYS, AND WIPE TESTS OF THE JAM SENSORS
- 6.4.1 The Ohmart gauges shall be tested for leakage (wipe test) every 3 years as required by the NRC. Any source that is received without a certificate indicating the equipment has been leak tested within the six months of transfer shall not be put into service until the source is leak tested.
- 6.4.2 Any gauge in storage and not being used need not be tested. When the gauge is removed from storage for use or transfer, it shall be tested prior to use or transfer.
- 6.4.3 Wipe tests shall be collected by the RSO or designee in accordance with PB-IH-016. The samples shall be analyzed by a lab that is licensed and certified by the NRC or Agreement State with the detection capability specified by the NRC. Detected leaks shall be reported to the NRC within five days of the test results. The report shall specify the source involved, test results, and corrective actions taken. Immediate action will be taken by WDC to ensure the leak is contained to minimize employee exposure. Results of the leak test results shall be kept in microcuries and shall be maintained for inspection by the NRC.
- 6.4.4 Each gauge shall be tested for proper operation of the ON-OFF shutter mechanism and indicator at six-month intervals. This test shall be conducted in accordance with PB-IH-016, DFS Jam Sensor Lockout/Tagout Leak Test and Shutter Check.
- 6.4.5 The RSO or designee shall conduct a physical inventory of all devices every six months. Inventory records shall be maintained for a minimum of three years from the date of the inventory. The record shall include the quantity and type, manufacturers name and model number, number of devices, and date of the inventory.
- 6.5 PERSONAL MONITORING/DOSIMETRY
- 6.5.1 Personnel involved in installation, relocation, removal, ~~maintenance, radiation surveying, leak testing,~~ or shipping of the Jam Sensors will be provided, and required to use, personal TLDs (or other approved dosimetry devices). ~~The dosimetry devices shall be exchanged on a quarterly basis during the above operation.~~
- 6.5.2 The personal monitoring program ~~will be evaluated after two years to determine if personal monitoring should continue.~~
- 6.6 RADIATION DETECTION EQUIPMENT
- 6.6.1 There shall be at least two survey meters on-site. shall be operable and the calibration shall be current capable of measuring at least 1 through 200 millirads calibrated to measure the appropriate radiation so.
- 6.6.2 The survey meters will be returned to the manufacturer annual basis. The calibration dates will be staggered meter will be available at all times.

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has been conducted and sufficient documentation has been acquired to demonstrate that personal exposure monitoring is no longer required for routine operations such as shutter checks, radiation surveying, leak testing, or preventative maintenance checks/calibrations..

ACCEPTANCE REVIEW MEMO (ARM)

Licensee: Washington Demilitarization Co. **License No.:** 03-27724-01
Docket No.: 030-35960 **Mail Control No.:** 471893
Type of Action: Amend **Date of Requested Action:** 07-31-08
Reviewer Assigned: **ARM reviewer(s):** J. Cook

Response	Deficiencies Noted During Acceptance Review
	<ul style="list-style-type: none">[] Open ended possession limits. Submit inventory. Limit possession.[] Submit copies of latest leak test results.[] Add IC L.C./Fingerprint LC, add SUNSI markings to license.[] Confirm with licensee if they have NARM material.

Reviewer's Initials: _____ **Date:** _____

- ☐ Yes ☐ No Request for unrestricted release Group 2 or >. Consult with Bravo Branch.
- ☐ Yes ☐ No Termination request < 90 days from date of expiration
- ☐ Yes ☐ No Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)
- ☐ Yes ☐ No TAR needed to complete action.

Branch Chief's and/or HP's Initials: _____ **Date:** _____

SUNSI Screening according to RIS 2005-31

☐ Yes ☒ No **Sensitive and Non-Publicly Available** if any item below is checked

General guidance:

- _____ RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
- _____ Exact location of RAM [suite #, bldg. #, location different from mailing address] (whether = or > than Category 3 or not)
- _____ Design of structure and/or equipment (site specific)
- _____ Information on nearby facilities
- _____ Detailed design drawings and/or performance information
- _____ Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

- _____ RAM quantities and inventory
- _____ Manufacturer's name and model number of sealed sources & devices
- _____ Site drawings with exact location of RAM, description of facility
- _____ RAM security program information (locks, alarms, etc.)
- _____ Emergency Plan specifics (routes to/from RAM, response to security events)
- _____ Vulnerability/security assessment/accident-safety analysis/risk assess
- _____ Mailing lists related to security response

Branch Chief's and/or HP's Initials:  **Date:** AUG 22 2008

AUG 26 2008

DATE

This is to acknowledge the receipt of your letter/application dated 7-31-08, and to inform you that the initial processing, which includes an administrative review, has been performed.

☒ There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

☐ A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 471893.
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,

Cullen Murnahan

Licensing Assistant

BETWEEN: : (FOR LFMS USE)
: INFORMATION FROM LTS
: -----
:
License Fee Management Branch, ARM : Program Code: 03120
and : Status Code: 0
Regional Licensing Sections : Fee Category: 3P
: Exp. Date: 20120531
: Fee Comments:
: Decom Fin Assur Req'd: N
: ::::::::::::::::::::::::::::::::::::::

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED
Applicant/Licensee: WASHINGTON DEMILITARIZATION CO.
Received Date: 20080731
Docket No: 3035960
Control No.: 471893
License No.: 03-27724-01
Action Type: Amendment

2. FEE ATTACHED
Amount: _____
Check No.: /

3. COMMENTS

Signed *Colleen Murnahan*
Date 8-13-08

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /__/)

1. Fee Category and Amount: _____
2. Correct Fee Paid. Application may be processed for:
Amendment _____
Renewal _____
License _____
3. OTHER _____

Signed _____
Date _____